

Radiotechniques

402 TENTH AVENUE • P.O. BOX 367 • HADDON HEIGHTS, NJ 08035-0367

Engineering Report
Counterproposal in MM Docket 97-252
Patterson Broadcasting, Inc.

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This counterproposal serves a substantial amount of white and grey areas. Figure 5 is a map detailing the existing AM and FM services to an area northwest of Cross City. The proposed Cross City 243C3 service contours will provide service to most of the white area, and nearly all of the grey area. The WDFL Cross City 295C1 proposal will not serve any white area, and serves only a tiny portion of the grey areas now receiving only one service, whereas this Cross City 243C3 counterproposal will serve most of the present white area, and a large additional single service grey area.

The white and grey areas are in Taylor County, and comprise a substantial portion of Perry South Division. Several thousand people reside in Perry South Division.

Current Short Spacings Relieved

The present facility of WEAG-FM, Starke, Florida is short spaced under Federal Communications Commission Rules and Regulations 47CFR § 73.207 to the following stations:

- WKBX, Kingsland, FL - Co-channel short spacing of 10.2 km
- WDFL (Licensed), Cross City, FL - Co-channel short spacing of 9.3 km
- WXOF, (CP) Beverly Hills, FL - Co-channel short spacing of 4.1 km
- WTLK-FM, Ponte Vedra Beach, FL - First adjacent short spacing of 7.5 km
- WCJX, Five Points, FL - First adjacent channel short spacing of 6.1 km

The WDFL 295C1 proposal is short spaced with the following stations:

- Radio Station WXXL Tavares, FL is First Adjacent channel short spaced by 8.2 km
- Radio Station WSNI Thomasville, GA is First Adjacent channel short spaced by 4.9 km
- Radio Station WCJX, Five Points, FL is Second Adjacent channel is short spaced by 1.9 km.

The WXOF, Beverly Hills, FL construction permit is short spaced with WEAG, Starke, FL by 4.1 km.

Each of these short spacings would be completely eliminated by implementing this counterproposal. Each of the listed stations would benefit from reduction in interference and return to full spacing.

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Conclusion

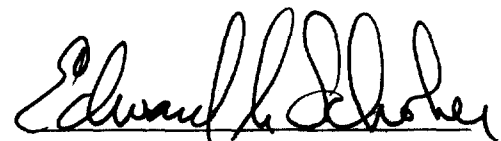
The counterproposal described herein will provide a substantial public benefit in several ways. First a large white area will receive two new services. Second, a large grey area receiving only one service will now receive two or three. Third, the total population served will increase greatly for all stations, both in absolute terms and in relative terms for each station. Fourth, it will serve to provide a reduction in the short spacing between stations, thereby providing relief from mutual interference between stations..

Engineer's Statement

This is to certify that this report has been prepared by myself, or under my direction. It is correct and accurate of my own knowledge, except where stated otherwise, and where this is so, the information is correct to the best of my knowledge and belief.

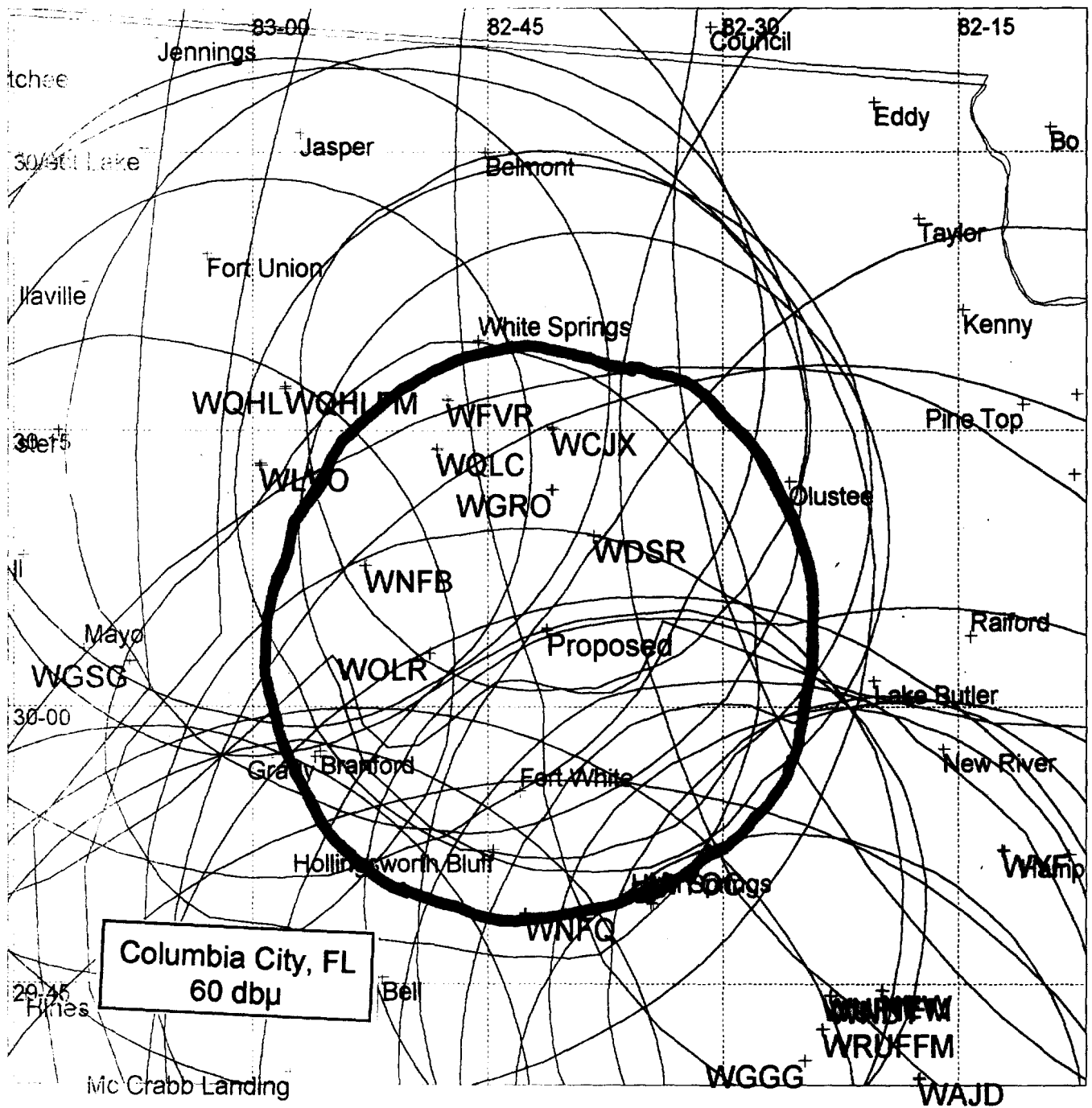
I further certify that I am a Licensed Professional Engineer in the State of New Jersey, and the Commonwealth of Pennsylvania, with a BSEE degree from the Newark College of Engineering of NJIT, and that I am regularly engaged in the practice of radio engineering with the firm of Radiotechniques Engineering Corporation, with offices at 402 Tenth Avenue, Haddon Heights, NJ. I am a member of the AFCCE, senior member of the IEEE, and SBE, and hold an FCC General Radiotelephone Operator License, and am Certified as a Senior Broadcast Engineer by the SBE. My qualifications are a matter of record with the FCC.

Date: February 27, 1998



Edward A. Schober, PE

(Seal)



Scale 1:620000

25 Km

--- AM Service Day
--- State Borders

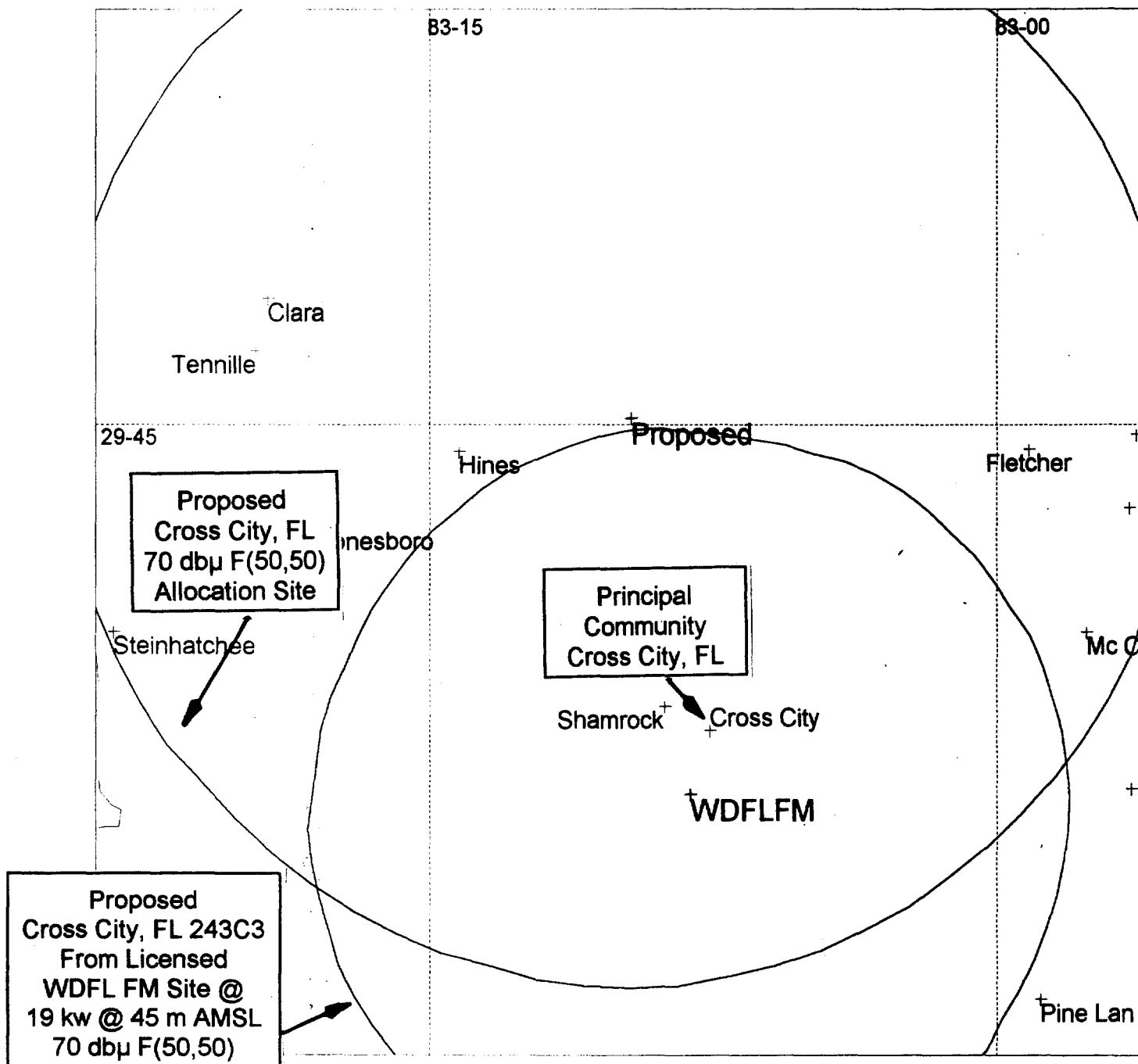
--- FM Service
--- Lat-Lon Grids

— FM Interfering

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Figure 1
Services Provided to
Columbia City, FL Area

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Scale 1:250000

5 Km

FM Service

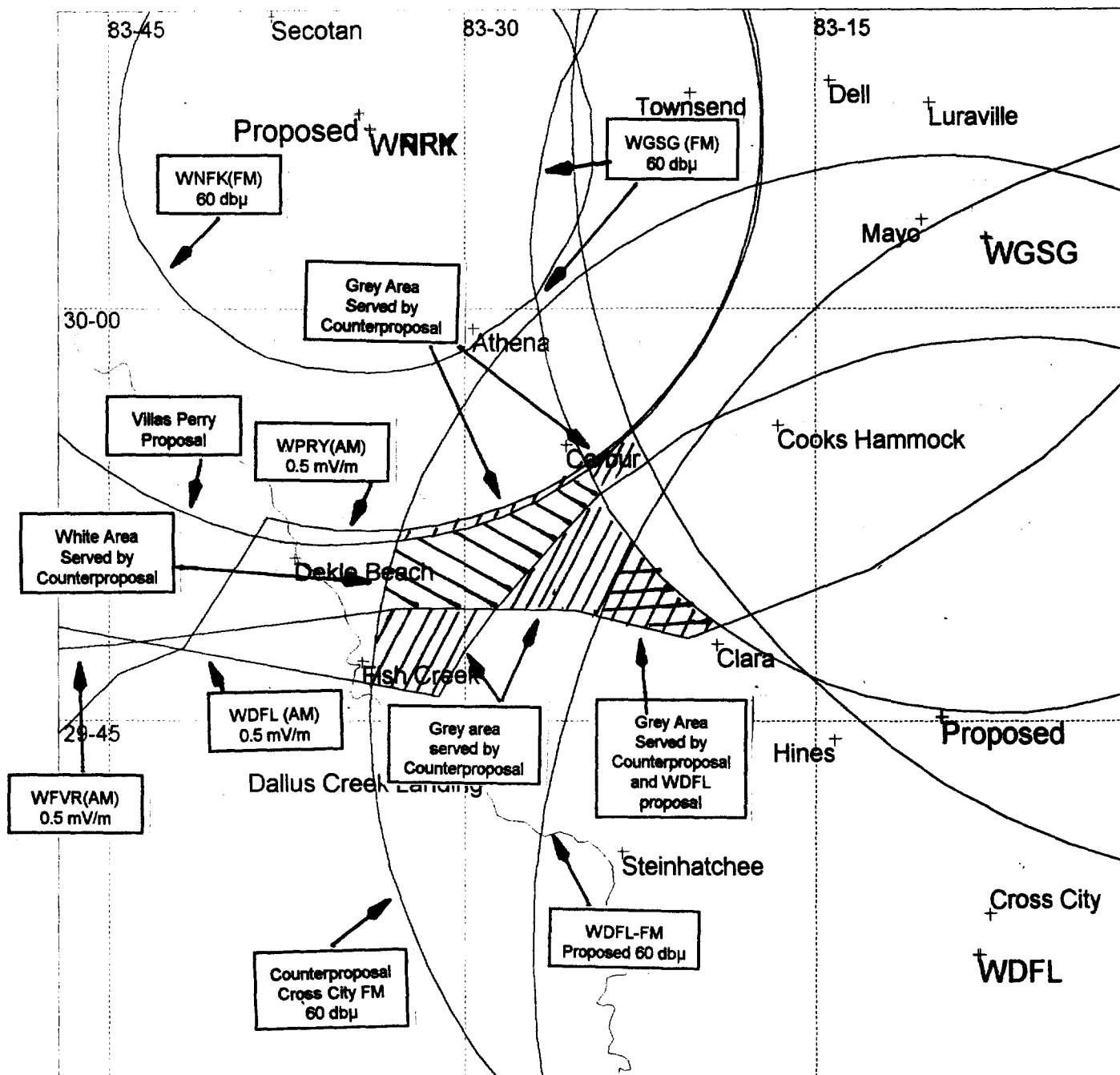
State Borders

Lat-Lon Grids

Figure 2
Principal Community Coverage
Cross City, FL

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Counterproposal for
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Scale 1:410000

10 Km

— AM Service Day
— Lat-Lon Grids

— FM Service

— State Borders

Figure 4
Principal Community Coverage
Starke, FL

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Dickerson Broadcasting, Inc.
February 1998

CERTIFICATE OF SERVICE

I, Harry F. Cole, hereby certify that on this 2nd day of March, 1998, I caused copies of the foregoing "Comments, Opposition and Counter-Proposal of Dickerson Broadcasting, Inc." to be placed in the U.S. Postal Service, first class postage prepaid, or hand delivered (as indicated below), addressed to the following persons:

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/s/ Harry F. Cole
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